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Attorney for Plaintiff
VICTORIA ZARANDIOUN

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

VICTORIA ZARANDIOUN)	Case No.: 2:14-cv-00008
)	
Plaintiff,)	
vs.)	
)	
)	
U.S. DEPT. OF HOMELAND SECURITY)	
Defendant,)	

UNOPPOSED MOTION FOR EXTENSION OF TIME WITHIN WHICH TO FILE
DISCOVERY PLAN/SCHEDULING ORDER
(FIRST REQUEST)

Pursuant to Federal Rule of Civil Procedure 6(b) and LR 6-2 VICTORIA F. ZARANDIOUN ("Plaintiff") respectfully makes this unopposed motion requesting a thirty (30) day extension to file the Discovery Plan/Scheduling Order. Currently, the Parties are scheduled to submit their Discovery Plan/Scheduling Order on November 10, 2014. The grounds for the motion are as follows:

New information has come to light regarding Plaintiff's case and undersigned counsel needs additional time to conduct further research, consult with the Plaintiff, and contact Plaintiff's previous legal counsel. The Parties are contemplating resolving this case without having to proceed to trial.

Undersigned counsel contacted opposing counsel, Mr. John Inkeles on November 4, 2014, who advised that he has no objection to the requested extension. This extension will

1 prejudice neither party, but rather will facilitate the efficient disposition of this matter. Should
2 such filing still be necessary, the Parties will comply no later than 5 p.m. EST, on December 10,
3 2014.

4
5 Dated: November 6, 2014

6 Respectfully Submitted,

7 /s/ Emily R. Navasca

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ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

Dated: November 7, 2014

CERTIFICATE OF SERVICE

Case No. 2:14-cv-00008

I hereby certify that on this 6th day of November, 2014, I served the foregoing pleading on all counsel of record by means of the District Clerk's electronic filing system.

/s/ Emily R. Navasca

Emily R. Navasca

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